

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
LEROY CLARENCE HOUSE JR,	:	
Debtor,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:24-bk-01781-HWV
LAKEVIEW LOAN SERVICING, LLC,	:	
Movant,	:	
	:	
LEROY CLARENCE HOUSE JR,	:	
JACK N ZAHAROPOULOS,	:	
Chapter 13 Trustee	:	
Respondents	:	

**DEBTOR’S ANSWER TO MOVANT’S MOTION FOR RELIEF FROM
THE AUTOMATIC STAY**

AND NOW COMES, Debtor, Leroy Clarence House Jr, by and through his attorneys, Jacobson, Julius & Harshberger, and hereby files this Answer to Movant’s Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6. It is admitted Debtor may be behind on payments to Movant. It is denied as to the amount in arrears. Debtor is willing to get current with Movant via an amended plan by adding the arrears post-petition to the plan. In the alternative, Debtor is willing to complete a stipulation with the Movant to cure the arrears within six months or via an amended Chapter13 plan. Debtor has applied for a loan modification with M&T Bank (Note Holder) and it is believed the modification was preliminarily approved subject to an subordination issue related to a judgment

in favor of the Debtor's home owner's association. Debtor would like to speak with counsel so as to see if the issue can be resolved to save his home.

7. It is admitted Debtor may be behind on payments to Movant. It is denied as to the amount in arrears. Debtor is willing to get current with Movant via an amended plan by adding the arrears post-petition to the plan. In the alternative, Debtor is willing to complete a stipulation with the Movant to cure the arrears within six months or via an amended Chapter13 plan.

8. Admitted on informational belief.

9. Paragraph 9 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

10. Paragraph 10 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

11. Paragraph 11 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further request any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS, & HARSHBERGER

Dated: January 14, 2024

/s/Chad J. Julius

ID# 209496

8150 Derry Street, Ste A

Harrisburg, PA 17111

717.909.5858

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
LEROY CLARENCE HOUSE JR,	:	
Debtor,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:24-bk-01781-HWV
LAKEVIEW LOAN SERVICING, LLC,	:	
Movant,	:	
	:	
LEROY CLARENCE HOUSE JR,	:	
JACK N ZAHAROPOULOS,	:	
Chapter 13 Trustee	:	
Respondents	:	

CERTIFICATE OF SERVICE

I, Dera Shade, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within **Answer to Movant's Motion for Relief from The Automatic Stay** upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Jack N. Zaharopoulos, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	Brent J. Lemon, Esquire KML Law Group, PC 701 Market Street Suite 5000 Philadelphia, PA 19106
United States Trustee The Sylvia H. Rambo US Courthouse 1501 North 6th Street, Bankruptcy Courtroom 8 4th Floor Harrisburg, PA 17102	

/s/ Dera Shade
8150 Derry Street, Ste A
Harrisburg, PA 17111
Email: dshade@ljacobsonlaw.com

Dated: January 14, 2025